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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
VICINAGE OF NEWARK

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LEE EVANS, : HON. KEVIN McNULTY, U.S.D.J.  
Plaintiff, : HON. MICHAEL A. HAMMER, U.S.M.J.  
v. : Civ. Dkt. 14-cv-00120 (KM-MAH)  
CITY OF NEWARK, et al., : **NOTICE OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT PURSUANT TO FED.**  
Defendants. : **R. CIV. P. 56**

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**PLEASE TAKE NOTICE** that on 2022, or as soon thereafter as counsel may be heard, the undersigned Matthew J. Platkin, Acting Attorney General of New Jersey, by Victor DiFrancesco, Jr. and Michael Vomacka, Deputy Attorneys General, as Attorneys for State Defendant William Tietjen, shall move before this Court for an Order granting summary judgment in

favor of Defendant and thereby dismissing Plaintiff's Complaint with prejudice against said Defendant.

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely upon the attached brief in support of this Motion.

It is respectfully requested that the Court consider this motion upon the moving papers submitted, without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

A proposed form of Order is attached.

MATTHEW J. PLATKIN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: s/Victor DiFrancesco, Jr.  
Victor DiFrancesco, Jr.  
Deputy Attorney General

By: s/Michael Vomacka  
Michael Vomacka  
Deputy Attorney General

Dated: August 17, 2022